

**UNITED STATES DISTRICT COURT FOR THE  
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA, )  
                                )  
Plaintiff                   )  
                                )  
vs.                         )                              Civil No. 05-CV-11421-RCL  
                              )  
JOSEPH MOUJABBER, Executor )  
of the Estate of Douglas Abelnour, )  
                              )  
Defendant                   )

**DEFENDANT'S MOTION FOR PROTECTIVE ORDER**

Defendant, Joseph Moujabber, Executor of the Estate of Douglas Abelnour (hereafter "Defendant"), moves this Honorable Court for a protective order limiting the Edgartown National Bank of 2 South Water Street, Edgartown, Massachusetts, from having to produce certain of the documents listed in Plaintiff's Subpoena Attachment A on February 22, 2008.

As grounds for his motion, Defendant states as follows:

1. The above captioned suit was brought by the Plaintiff against Douglas Abelnour (deceased) for federal tax liability recognized as of December 31, 1992.
2. In its subpoena to the Edgartown National Bank, Plaintiff is seeking "(a) any accounts (loan, credit, deposit, checking or any other kind) in the name of Douglas Island Development Corporation" from 1990 to present.
3. On or about June 28, 1992, Douglas Abelnour (deceased) transferred 100% of the stock in Douglas Island Development Corporation to Joseph Moujabber for adequate consideration.
4. After Douglas Abelnour (deceased) transferred said stock, he had no interest in Douglas Island Development Corporation and received no direct benefit from it.

5. Defendant does not seek the Court's protection for Douglas Island Development Corporation documents held by the Edgartown National Bank dated on or before June 27, 1992.

Defendant, Joseph Moujabber,  
Executor of the Estate of Douglas AbdeInour  
by his attorneys,

/s/ John F. Whiteside, Jr.  
John F. Whiteside, Jr., BBO# 646541  
Gregory J. Koldys, BBO #276840  
MICKELSON ♦ BARNET, P.C.  
30 Cornell Street  
New Bedford, MA 02740  
Telephone (508) 993-8800  
[jfw@mickelsonbarnet.com](mailto:jfw@mickelsonbarnet.com)

Dated: February 20, 2008

**Certificate of Service**

I hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF). and paper copies will sent to those indicated as non-registered participants on February 20, 2008.

/s/ John F. Whiteside, Jr.  
John F. Whiteside, Jr. (BBO# 646541)